

ATTACHMENT 2

INSPECTION SCHEDULES AND PROCEDURE

INSPECTION SCHEDULES AND PROCEDURES

II.A. Purpose and Scope

The inspection schedule used by ATK for the hazardous waste management areas has been designed to meet the requirements of R315-8.2.6. The design of the schedule promotes the detection of malfunctions, deterioration, discharges, and other situations which may be causing or leading to a release of hazardous waste constituents into the environment or pose a threat to human health. Eight areas are designated for inspection: the container storage area at E-501, M-705S, M-186, the burning grounds at M-136 (including the LTTAs, burn trays and Burn Station 14), M-225, T-29B hydrazine dilution and the solid propellant/motor storage buildings, M-47 and M-603.

Inspections are conducted by personnel trained to identify potential problem areas and to use the inspection schedule and the inspection log. The T-29B hydrazine dilution process uses a UN drum in which treatment occurs. The hydrazine waste collection tank is tested and certified annually.

The Permittee may discontinue inspections of a storage facility during extended periods of inactivity, as approved by the Executive Secretary. A facility must be inspected, however, prior to receiving hazardous waste for storage or treatment if inspections were discontinued during the period of inactivity. If any problems are identified with the areas of concern that are listed in the inspection schedules (contained in this attachment), they must be corrected before the facility is put back into use.

II.B. Remedial Action or Maintenance

Repairs or corrective action for any deterioration or malfunction discovered by an inspection shall be conducted as outlined in Module II, Section F. Repairs to security equipment shall be completed as soon as practicable, but not later than 72 hours after the problem is discovered. As stated in R315-8-2.6(c), where a hazard is imminent or has already occurred, remedial action shall be taken immediately.

II.C. Inspection Records

All records of inspections and remedial actions shall be retained in the Operating Record, for a period of at least three years. At a minimum, inspection records shall include the date and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or maintenance taken.

II.D. Inspection Schedules

The inspection schedules appear in detail in Tables II-A through II-F. Each inspection schedule is designed so that the items appearing on the schedule are inspected frequently enough to avoid any deterioration of equipment and thus reduce the probability of an environmental or human health incident between inspection times. Each inspection schedule is divided into individual categories and each category contains a specific list of items to be inspected. Inspections are also required within 24 hours after a storm event as outlined in the schedules below. A storm event is defined as precipitation in excess of 1.0 inch in a one-hour period. It shall be documented in the inspection log that the inspection was conducted in response to a storm event.

TABLE II-A
INSPECTION SCHEDULE FOR DRUM STORAGE AT M-186

<u>EQUIPMENT</u>	<u>MINIMUM FREQUENCY</u>	<u>AREAS OF CONCERN</u>
1. Security Equipment		
Fences	Weekly	Visually inspect all fence lines and look for broken or downed fence lines, loose wires
Signs	Weekly	Readable signs, signs in place
Gates	Weekly	Able to properly close gate, safety flags in place
Lock	Weekly	In working order, able to lock
2. Area		
Roadway	Daily ¹	Inspect road for spills, soil discoloration
Loading/ Unloading Areas	Daily ¹	Inspect loading areas for spills, soil discoloration
Periphery	Daily ¹	Inspect grounds for any spills, soil discoloration or stressed vegetation

3. Safety Equipment

Eyewash/Shower	Monthly	Ensure in working order by testing, check water supply
Telephone/Radio	Monthly	Working condition

4. Storage Containment

Containers	Weekly	Number of containers, severe corrosion (i.e., flaking, large rust buildup, rusty bungs), dented drums, hazardous waste labels in place, properly marked, readable, open bungs, no standing liquid on drums, adequate aisle space (2.5 feet)
Pads	Weekly ²	Chips, cracks, or irregularities in concrete, general condition
Sumps/Pads	Daily ¹	Standing liquid on pad or in sumps
Drainage Area	Weekly ²	Spills, discolored soil
Roof	Weekly	General condition including holes or defects

5. Emergency Equipment

Fire Extinguisher	Monthly	Fire extinguisher full, in working order
Absorbent	Monthly	Adequate supply (minimum 25 lbs)
Repack Drums	Monthly	Two repack drums with seals
55-Gallon drums	Monthly	Six empty 55-gallon drums with bungs in good condition, no dents, etc.
Generator	Monthly	Routine oil check, fill with gas, test startup
Pump	Monthly	Good working order, hoses intact, test startup and pump

¹ When in use

² And after each storm event. A storm event is defined as more than one inch of precipitation in a one-hour period.

TABLE II-B
INSPECTION SCHEDULE FOR BURNING GROUNDS AT M-136

<u>EQUIPMENT</u>	<u>MINIMUM FREQUENCY</u>	<u>AREAS OF CONCERN</u>
1. Security Equipment		
Fences	Weekly	Visually inspect all fence lines, look for loose wires or broken lines
Signs	Weekly	Readable signs, signs in place
Gates	Weekly	Able to properly close gate
Lock	Weekly	In working order, able to lock
2. Area		
Roadway	Daily ¹	Spills, discolored soil
Loading/ Unloading Areas	Daily ¹	Spills, discolored soil
Periphery	Daily ¹	Spills, discolored soil, stressed vegetation
3. Safety Equipment		
Telephone/Radio	Monthly	Check operating condition of equipment
4. Burn Ground Area		
Erosion	Weekly ³	Survey area and note severe erosion on grounds
5. Storage/Containment		

Burn tray	Weekly ^{2,3}	Tray is intact and liquid tight, accumulation of liquids
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Container	Weekly ²	Closed, labeled, signs of leaks or spills
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6. Emergency Equipment

Fire Extinguisher	Monthly	Fire extinguisher full and in working order
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1 When in use

2 Inspect upon arrival, then each calendar week

3 And after each storm event. A storm event is defined as more than one inch of precipitation in a one-hour period.

TABLE II-C
INSPECTION SCHEDULE FOR BURNING GROUNDS AT M-225

<u>EQUIPMENT</u>	<u>MINIMUM FREQUENCY</u>	<u>AREAS OF CONCERN</u>
1. Security Equipment		
Fences	Weekly	Visually inspect all fence lines, look for loose wires or broken lines
Signs	Weekly	Readable signs, signs in place
Gates	Weekly	Able to properly close gate
Lock	Weekly	In working order, able to lock
2. Area		
Roadway	Daily ¹	Spills, discolored soil
Loading/Unloading Areas	Daily ¹	Spills, discolored soil
Periphery	Daily ¹	Spills, discolored soil, stressed vegetation

3. Safety Equipment

Telephone/Radio	Monthly	Check operating condition of equipment
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4. Burn Ground Area

Erosion	Weekly ²	Survey area and note severe erosion on grounds
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Burn Tray	Weekly ²	Tray is intact and liquid tight, accumulation of liquids
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5. Emergency Equipment

Fire Extinguisher	Monthly	Fire extinguisher full and in working order
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¹ When in use

² And after each storm event. A storm event is defined as more than one inch of precipitation in a one-hour period.

TABLE II-D INSPECTION SCHEDULE FOR STORAGE AND CONSOLIDATION ROOM AT M-705S

<u>EQUIPMENT</u>	<u>MINIMUM FREQUENCY</u>	<u>AREAS OF CONCERN</u>
1. Security Equipment		
Signs	Weekly	Readable signs, signs in place
2. Area		
Roadway	Daily ¹	Spills, discolored soil
Loading/Unloading Areas	Daily ¹	Spills, discolored soil
Periphery	Daily ¹	Spills, discolored soil, stressed vegetation

3. Safety Equipment

Eyewash/Shower	Monthly	Ensure in working order by testing, check water supply
Telephone/Radio	Monthly	Check operating condition of equipment

4. Storage containment

Containers	Weekly	Number of containers, severe corrosion (i.e. flaking, large rust buildup, rusty bungs), dented drums, hazardous waste labels in place, properly marked, readable, no open bungs, no standing liquid on the drums
Pads, Sumps	Weekly	Chips, cracks, or irregularities in the concrete, general conditions
Portable Secondary	Daily ¹	Cracks, liquid, containment integrity
Roof	Weekly	General condition including holes or defects
Sump, pads	Daily ¹	Check for standing liquids in the sump and containment system

5. Emergency Equipment

Fire Extinguisher	Monthly	Fire extinguisher full and in working order
Absorbents	Monthly	Adequate supply (minimum 25 lbs.)
Repack Drums	Monthly	Two repack drums with seals
55-Gallon Drums	Monthly	Six empty 55-gallon drums with bungs in good condition, no dents, etc.

¹ When in use

TABLE II-E

INSPECTION SCHEDULE FOR M-47, M-603

<u>EQUIPMENT</u>	<u>MINIMUM FREQUENCY</u>	<u>AREAS OF CONCERN</u>
1. Security Equipment		
Signs	Weekly	Readable signs, signs in place
Bay Doors	Weekly	Function properly
Lock	Weekly	Function properly
2. Area		
Roadway	Daily ¹	Inspect road for spills, soil discoloration
Loading/Unloading Areas	Daily ¹	Inspect loading areas for spills, soil discoloration
Periphery	Daily ¹	Inspect grounds for any spills, soil discoloration or stressed vegetation
3. Communications Equipment		
Telephone	Monthly	Working condition; place call to verify operation
4. Storage Containers		
Motors/bags, etc.	Weekly	Verify condition of motors/bags, properly marked and labeled, out of place material and check for leakage, or liquid discharge from waste solid rocket motors and propellant .
Building	Weekly	Verify no damage done to exterior of facility
Roof	Weekly	General condition including holes or defects

5. Emergency Equipment

Fire Extinguisher	Monthly	In working order and full
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¹ When in use

TABLE II-F
INSPECTION SCHEDULE FOR DRUM STORAGE PAD AT E-501

<u>EQUIPMENT</u>	<u>MINIMUM FREQUENCY</u>	<u>AREAS OF CONCERN</u>
1. Security Equipment		
Fences	Weekly	Visually inspect all fence lines and look for broken or downed fence lines, loose wires
Signs	Weekly	Readable signs, signs in place
Gates	Weekly	Able to properly close gate, safety flags in place
Lock	Weekly	In working order, able to lock
2. Area		
Roadway	Daily ¹	Inspect road for spills, soil discoloration
Loading/ Unloading Areas	Daily ¹	Inspect loading areas for spills, soil discoloration
Periphery	Daily ¹	Inspect grounds for any spills, soil discoloration or stressed vegetation
3. Safety Equipment		
Eyewash/Shower	Monthly	Ensure in working order by testing, check water supply

Telephone/Radio	Monthly	Working condition
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4. Storage Containment

Containers	Weekly	Number of containers, severe corrosion (i.e., flaking, large rust buildup, rusty bungs), dented drums, hazardous waste labels in place, properly marked, readable, open bungs, no standing liquid on drums, adequate aisle space (2.5 feet)
Pads	Weekly	Chips, cracks, or irregularities in concrete, general condition
Sumps/Pads	Daily ¹	Standing liquid on pad or in sumps
Drainage Area	Weekly ²	Spills, discolored soil
Roof	Weekly	General condition including holes or defects

5. Emergency Equipment

Fire Extinguisher	Monthly	Fire extinguisher full, in working order
Absorbent	Monthly	Adequate supply (minimum 25 lbs)
Repack Drums	Monthly	One repack drum with seals
55-Gallon drums	Monthly	Three empty 55-gallon drums with bungs in good condition, no dents, etc.

¹ When in use

² And after each storm event. A storm event is defined as more than one inch of precipitation in a one-hour period.

TABLE II-G
INSPECTION SCHEDULE FOR T-29 Hydrazine Dilution Bay

<u>EQUIPMENT</u>	<u>MINIMUM FREQUENCY</u>	<u>AREAS OF CONCERN</u>
1. Security Equipment		
Signs	Weekly ¹	Readable signs, signs in place
Door Locked	Weekly ¹	In working order, locked
2. Area		
Roadway	Daily ¹	Inspect road for spills, soil discoloration
Loading/ Unloading Areas	Daily ¹	Inspect loading areas for spills, soil discoloration
Periphery	Daily ¹	Inspect grounds for any spills, soil discoloration or stressed vegetation
3. Safety Equipment		
Eyewash/Shower	Monthly	Ensure in working order by testing, check water supply
Telephone(cell)	Monthly	Working condition
4. Storage Containment		
Containers	Weekly ¹	Number of containers, severe corrosion (i.e., flaking, large rust buildup, rusty bungs), dented drums, hazardous waste labels in place, properly marked, readable, open bungs, no standing liquid on drums
Floor	Weekly ¹	Chips, cracks, or irregularities in concrete, general condition

Roof Weekly¹

General condition including holes or defects

5. Emergency Equipment

Fire
Extinguisher Monthly

Fire extinguisher full, in working order

Absorbent Monthly¹

Adequate supply (minimum 25 lbs)

Collection tank Annual

Verify certification

¹ When in use